

SBC

June 30, 2004

CC Docket No. 01-338

# Broadband Deployment Requires Certainty

- Reject CLEC demands for TDM deployment
- Maintain clear and unambiguous UNE exemption for “packet switching”

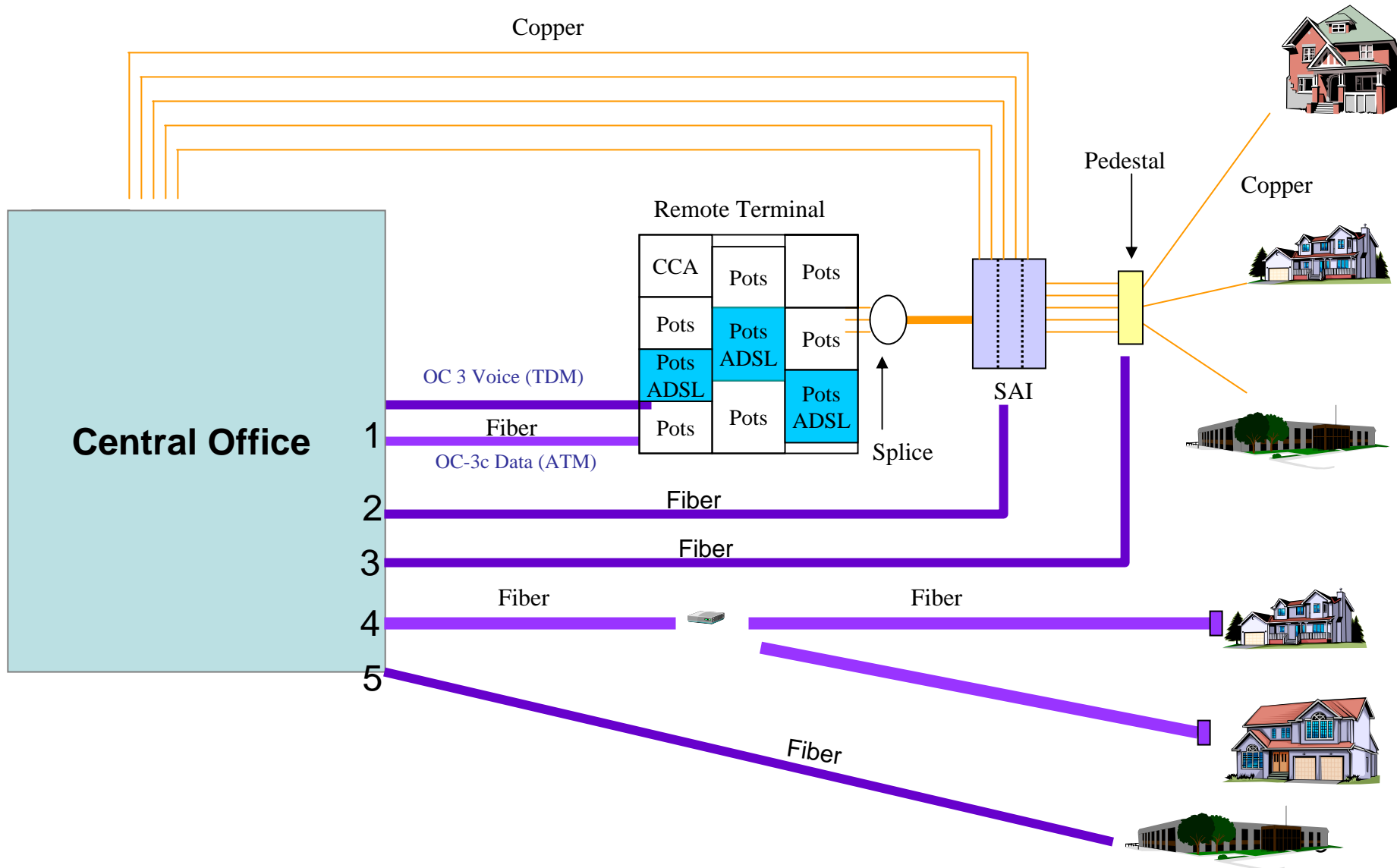
## Affirm Parameters for CLEC Access to TDM Capability

- FCC must not change criteria for CLEC access to TDM capability. In particular--
  - no requirement to design, reconfigure, or modify next generation networks to facilitate CLEC requests for TDM capability.
- CLECS demands to dictate ILEC network design and evolution would:
  - force inefficient network design
  - increase ILEC costs and undermine economics of broadband deployment.

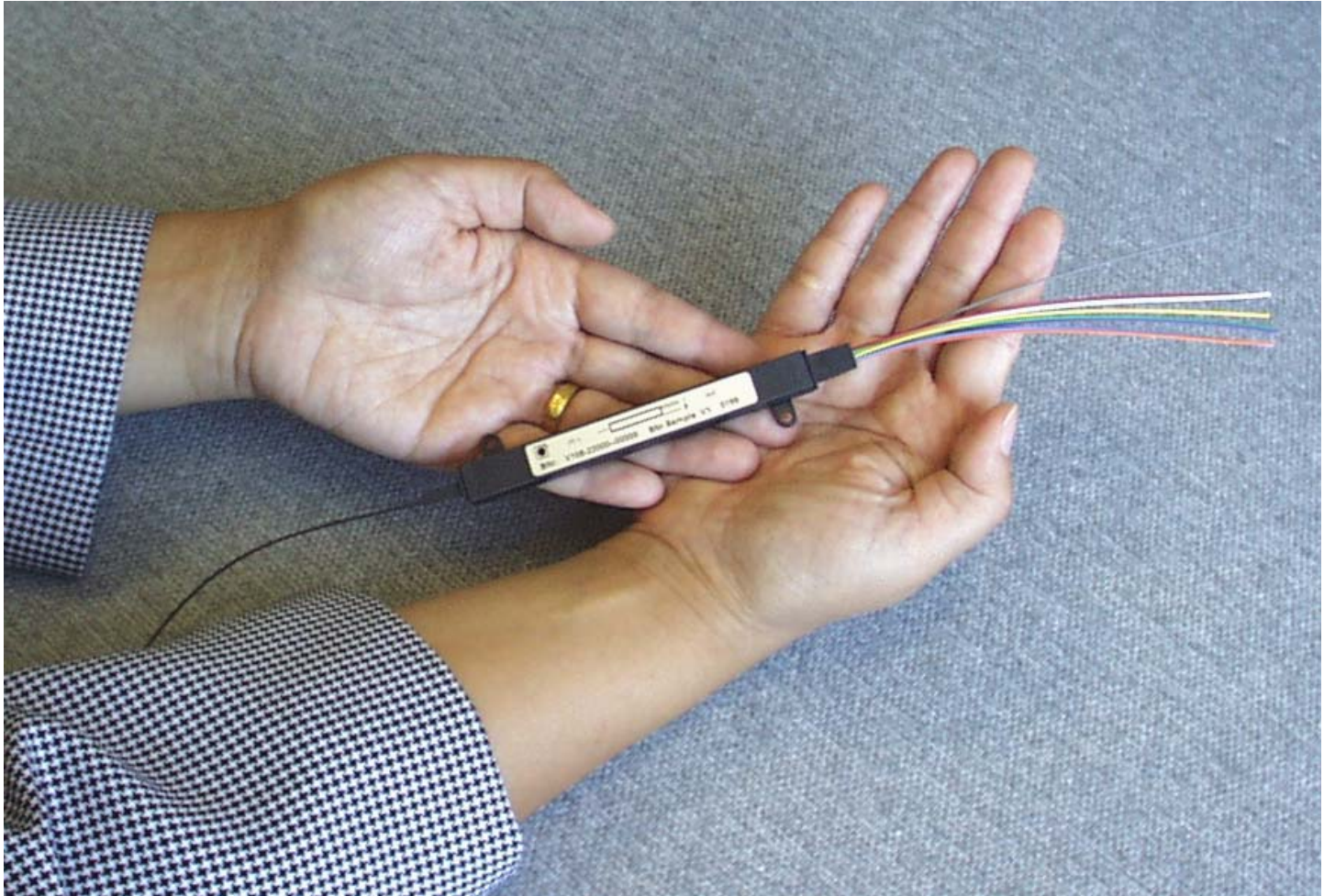
# Reject Attempts to Gut Packet Exemption

- TRO set forth national policy that must not be undermined.
- Broad scope of exemption is clear and unambiguous
  - Attempts to bootstrap DS-1/DS-3 UNE requirements to packet facilities is a back door attempt to gut the packet switching exemption.
- Commission must be absolutely clear in affirming the scope of the exemption to avoid ambiguity, particularly at the state level.

# Options for Broadband Deployment



# Passive Optical Replicator



# Fiber In The Loop Serves Many Purposes

